

Leonard C. Jefferson, CL-4135
10745 Rt. 18
Albion, PA 16475-0002
October 1, 2006

Mary Friedline
Senior Deputy Attorney General
Office of Attorney General
6th Floor, Manor Complex
564 Forbes Avenue
Pittsburgh, PA 15219

RE: DEFENDANTS' INSUFFICIENT RESPONSES
TO PLAINTIFF'S ORIGINAL COMPLAINT AND INTERROGATORIES

Dear Ms. Friedline:

In the DEFENDANT'S RESPONSE TO PLAINTIFF'S THIRD AMENDED COMPLAINT (Doc # 86), which was filed on 07/13/06, you state: "At this time, Defendants are without knowledge of information to form a belief as to the truth of the averments of" as your response to ¶¶ 32 - 42, ¶ 77, and ¶ 87. In addition to the fact that more than two and a half months have passed since the filing of Doc # 86 without Defendants' providing the supplemental response required by Rule 26(e) of the Fed.R.Civ.P.; Defendant's 09/19/06 DEFENDANT'S RESPONSE TO PLAINTIFF'S INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS indicates Defense Counsel is now in possession of knowledge and information upon which counsel can determine the truth or falsity of the above-mentioned paragraphs. ¶ Defendants' answer to Plaintiff's 08/02/06 Interrogatory no. 4 is not responsive to the question asked. Plaintiff's Interrogatory no. 4 asks for a citation of authority (i.e., a law, statute, constitutional provision or other duly enacted legislation). Defendants are required to simply cite the authority if it exists or, if it does not exist, admit it does not exist. ¶ Defendants' answer to Plaintiff's 08/02/06 Interrogatories nos. 5 & 6 are not responsive to the question asked. ¶ Defendants' answer to Plaintiff's 08/02/06 Interrogatory no. 10 is disingenuous. One of Plaintiff's Chapel Clerk duties was to count the number of Muslims in the jail and report the total to Imam Abdalla and/or Defendant McQuown. This information is relevant and can be obtained by Defendants Beard, Boeh and McQuown by a few clicks of their mouses. ¶ Defendant's objection to Plaintiff's Interrogatories nos. 18 through 22 are disingenuous. ¶ Please be advised that Plaintiff intends to ask the Court to compel proper responses in the matters mentioned above in the event Plaintiff has not received sufficient and complete responses to all of the above-mentioned items by the 14th day of October, 2006. ¶ Please find enclosed the following documents: PLAINTIFF'S REQUEST FOR ADMISSIONS, PLAINTIFF'S SECOND REQUEST FOR JUDICIAL NOTICE, and PLAINTIFF'S SECOND INTERROGATORY.

Thank you for your attention to this matter.

Respectfully

Leonard C. Jefferson

cc: Judge Baxter
file